

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 24, 2017.

Permit Number: **R30-07700017-2017 (MM01, MM02)**

Application Received: **MM01 October 21, 2020**

MM02 February 16, 2021

Plant Identification Number: **077-00017**

Permittee: **Columbia Gas Transmission, LLC**

Facility Name: **Terra Alta Compressor Station**

Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Permit Action Number: *MM01, MM02*

Revised: *July 13, 2021*

Physical Location:	Terra Alta, Preston County, West Virginia
UTM Coordinates:	625.13 km Easting • 4364.38 km Northing • Zone 17
Directions:	From I-79 take State Route 7 east to Terra Alta. Traveling east on State Route 7 to the town of Terra Alta, turn right onto Secondary Route 53. Proceed approximately 2 miles to the station which is located on the right.

Facility Description

Terra Alta Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) heaters, five (5) 1100-hp and one (1) 174-hp natural gas fired reciprocating engines, one (1) 530-hp emergency engine/generator, one (1) 3.57 mmBtu/hr heating system boiler, one (1) 0.5 MMBtu/hr odorant flare, and one (1) 250 gallon mercaptan odorant storage tank

Modification MM01 is for the construction of two (2) methanol tanks and to incorporate five (5) additional produced fluids storage tanks and their associated one (1) truck loading rack permitted under R13-3431B.

Modification MM02 is for the removal of four (4) line heaters (HTR1 through HTR4) and re-naming of Emission Unit IDs of Methanol storage tanks from "A-29" to "A-33" and from "A-30" to "A-34" permitted under R13-3431C.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Increase in Potential Emissions (TPY)
NO _x	-8.59
CO	-7.21
VOCs	0.01
PM/PM ₁₀ /PM _{2.5}	-0.65
SO ₂	-0.06
Formaldehyde	-0.01
Methanol	0.35
Total HAPs	0.25

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 592.70 TPY of NO_x and 11.08 TPY of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR permitting
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3431C	3/15/2021	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

Produced Fluids tanks A-09 through A-13 were installed in 1990. Each tank has a capacity of 30,000 gallons (113.56 m³). The produced fluid is condensate stored prior to being hauled away. This subpart does not apply to vessels with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.

Methanol tanks A-33 (capacity 37.85 m³) and A-34 (capacity 28.39 m³) capacities are less than 75 cubic meters and are exempt from this subpart.

40 CFR 60 Subpart OOOOa – Standards Of Performance For Crude Oil And Natural Gas Facilities For Which Construction, Modification, Or Reconstruction Commenced After September 18, 2015

Subpart OOOOa establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC), and sulfur dioxide (SO₂) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after September 18, 2015. Based upon the Federal applicability of Subpart OOOOa, the Terra Alta facility is potentially subject to this Rule.

Storage Vessels: Emissions from storage vessels A-33 and A-34, constructed after September 18, 2015, are not expected to be at or above 6 tons per year (tpy) of VOC (see emission limits in condition 9.1.1.). Therefore, A-33 and A-34 are not affected storage vessels.

Revisions to Existing Title V Permit Conditions

Existing Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-3431C Condition
1.1	H1, H2, H3, H4 deleted; A-33, A-34, A-09 through A-13, and LR-1 added	N/A	1.1
3.7.2.e.	Includes additional tank capacity of less than 75 cubic meters.	40CFR§60.110b(a)	N/A
4.0	Removed requirements for H1, H2, H3, H4	N/A	N/A

New Title V Permit Conditions

The following new permit conditions were added with this modification:

New Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-3431C Condition
9.1.1.	Maximum emissions limits	45CSR§13-5.10	6.1.1
9.1.2.	Throughput limitations	45CSR§13-5.10	6.1.2
9.2.1.	Monitor throughput to each storage vessel	45CSR§13-5.10	6.2.1.
9.3.1	Facility-Wide Testing Requirements	45CSR§13-5.10	6.3.1.
9.4.1.	Recordkeeping	45CSR§13-5.10	6.4.1.
9.5.1	Reporting	45CSR§13-5.10	6.5.1.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Jonathan Carney, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41247
Jonathan.W.Carney@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.